

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

JANE DOE (P.B.),

Plaintiff,

v.

WYNDHAM HOTELS & RESORTS, INC.  
d/b/a RAMADA INN, RAMADA  
FRANCHISE SYSTEMS, INC. d/b/a  
RAMADA INN, DORCA CO. INC. d/b/a  
RAMADA INN,

Defendant.

Civil No. 23-1493 (ESK/EAP)

**STIPULATION OF DISMISSAL  
WITH PREJUDICE**

**ORDER**

**IT IS HEREBY** stipulated and agreed that the claims of plaintiff Jane Doe (P.B.) against defendants Wyndham Hotels & Resorts, Inc., Ramada Franchise Systems, Inc. and Dorca Co. Inc. be and are hereby dismissed with prejudice and without costs against any party.

**LOCKS LAW FIRM**

Attorneys for Plaintiff, Jane Doe (P.B.)

By: /s Francesca A. Iacovangelo  
FRANCESCA A. IACOVANGELO,  
ESQ.

Dated: April 4, 2025

**DLA PIPER LLP (US)**

Attorneys for Defendants Wyndham Hotels & Resorts, Inc. and Ramada Franchise Systems, Inc.

By: /s David S. Sager  
DAVID S. SAGER, ESQ.

Dated: April 4, 2025

**GIORDANO, HALLERAN & CIESLA, P.C.**  
Attorneys for Defendant, Dorca Co. Inc.

By: /s Matthew N. Fiorovanti  
MATTHEW N. FIOROVANTI, ESQ.

Dated: April 4, 2025

**So Ordered.**

/s/ Edward S. Kiel  
**Edward S. Kiel, U.S.D.J.**  
**Date: April 7, 2025**